

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF WEST VIRGINIA**

CHARLESTON DIVISION

IN RE: ETHICON, INC., PELVIC REPAIR
SYSTEMS PRODUCTS LIABILITY LITIGATION

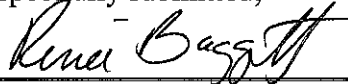
MDL NO. 2327

THIS DOCUMENT RELATES TO ALL CASES

**PLAINTIFFS' MOTION TO COMPEL ADVAMED'S RESPONSE TO
SUBPOENAS**

NOW INTO COURT, through undersigned counsel, come Plaintiffs who, pursuant to Rules 37 and 45 of the Federal Rules of Civil Procedure, hereby move the Court for an Order compelling non-party AdvaMed to respond to the subpoenas issued by Plaintiffs in this case within fifteen (15) days of this Court's Order. As grounds for this Motion, Plaintiffs submit the accompanying memorandum of law and exhibits. Plaintiffs certify that counsel for Plaintiffs and the subpoenaed parties have conferred in good faith but have been unable to resolve the present dispute.

Respectfully submitted,



D. Renee Baggett
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PLLC

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CERTIFICATE OF SERVICE

I certify that on the 14th day of January 2013, I electronically filed the foregoing Pleading with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record and that a copy was sent electronically to Allen M. Gardner, Latham & Watkins, LLP, 555 Eleventh Street, NW, Suite 1000, Washington, DC 20004-1304, allen.gardner@lw.com.

A handwritten signature in black ink, appearing to read "D. Rence Baggett", written over a horizontal line.

D. Rence Baggett